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June 8, 2022

VIA ECF

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: United States v. Encarnacion-Velez, et al. (Francia Espinal-Taveras)
21 Cr. 225 (MKV)

Dear Judge Vyskocil,

I represent Francia Espinal-Taveras in the above-captioned matter. We write to request the Court to order Pre-Trial Services to return Ms. Espinal Taveras' and her daughters' travel documents so she can travel to the Dominican Republic with her daughters.

On or about September 8, 2022 the Government and Ms. Espinal Taveras entered into a non-prosecution agreement which calls for a *nolle prosequi* to be filed at the end of the period of the deferred prosecution, which is June 8, 2022. I have spoken with the Government and they intend to file the *nolle prosequi* imminently as they are awaiting some paperwork from Pre-Trial Services, however, they do consent to the immediate return of Ms. Espinal Taveras' and her daughters' travel documents as they have been informed that Ms. Espinal Taveras has been compliant with all of the conditions of her deferred prosecution agreement.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

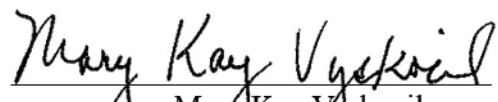
/s/

Joshua D. Kirshner

cc: All parties (via ECF)

Granted. SO ORDERED.

Date: June 21, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge